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8
9 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

10 DOMINIQUE PRESSEY, as individual
Heir and as Special Administratrix of the
11 ESTATE OF ROY ERIC GIORGI JR.,
MICHAEL GIORGI, as Individual Heir,
12 SOPHIA FRANZ, as Individual Heir, and
GABRIELLE GIORGI, as Individual Heir,

13 Plaintiff,

14 v.

15 UNITED STATES OF AMERICA,
16 Defendant.
17

Case No. 3:24-cv-00463-MMD-CSD

**Stipulation and Order to Extend
Discovery Deadlines**

(First Request)

18
19 Pursuant to LR IA 6-1 and LR 26-3, the parties request a sixty (60) day extension of
20 discovery deadlines, which is supported by grounds and circumstances set forth below. This
21 stipulation is filed at least 21 days before the earliest deadline to be extended (for initial
22 expert disclosures). This is the first request for an extension of the discovery schedule.

23 **DISCOVERY COMPLETED**

24 The parties have completed the following discovery:

- 25 1. Defendant made its initial disclosures on January 31, 2025.
26 2. Plaintiffs made their initial disclosures on January 13, 2025.
27 3. Defendant served its first sets of requests for production and first sets of
28 interrogatories on Plaintiffs on February 10, 2025.

EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER

The following table sets forth the current deadlines and the proposed sixty (60) day extension of discovery deadlines that are the subject of this stipulated request:

SCHEDULED EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Initial Expert Disclosure	April 10, 2025	June 9, 2025
Rebuttal Expert Disclosure	May 12, 2025	July 11, 2025
Discovery Cutoff	June 9, 2025	August 8, 2025
Dispositive Motions	July 9, 2025	September 8, 2025
Proposed Joint Pretrial Order	August 8, 2025	October 7, 2025

This request for an extension of time is not sought for any improper purpose including delay. This is the first request for an extension of discovery deadlines in this matter.

Respectfully submitted this 18th day of February 2025.

LAIRD LAW PLLC

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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: February 18, 2025